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12 UNITED STATES BANKRUPTCY COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14

15 LOS ANGELES DIVISION
16

17 In re:
18 Martin Ramirez Troche and
19 Maria Ramirez,
20
21 Debtors.
22

23 Case No.: 2:22-BK-13031-JB
24

25 **MOTION FOR 2004 EXAMINATION –
26 DEBTOR MARTIN RAMIREZ TROCHE**

27 Notice of No Hearing Served Pursuant to
28 LBR 9013-1(p)

17 Creditor Scott Dain, c/o Law Office of Anthony C. Duffy (“Creditor”) hereby requests an
18 order approving a 2004 examination for debtor Martin Ramirez Troche.

19 Prior to the petition being filed, debtors Martin Ramirez Troche and Maria Ramirez
20 (“Debtors”) operated businesses using a multitude of names and included their family members as
21 directors or officers. Just before filing, Debtors were operating a restaurant in the same strip mall as
22 another business purportedly owned and operated by their son, Ismael Ramirez. Creditors are
23 informed and believe the two businesses comingle their assets.

24 To date, Creditor has independently investigated the financial affairs of Debtors and their
25 family, and found the following business names operated by Debtors and relatives that are in various
26 states of suspension, use, or partial use:

27 1. Mariscos La Fiesta Restaurant Inc., aka Mariscos La Fiesta Restaurant
28 2. The Falcon Inn Corporation

- 1 3. La Fiesta Meat Market Inc.
- 2 4. La Fiesta Meat Market
- 3 5. La Fiesta Restaurant Group Inc.
- 4 6. Big O Fish Brews and Grill
- 5 7. Restaurant Managing Group Inc
- 6 8. Al Chile Pelon Mexican Food
- 7 9. Al Chile Pelon Restaurants Inc.
- 8 10. Baja King Fish Tacos and Mariscos
- 9 11. El Milagro Restaurants Group Inc.
- 10 12. La Fiesta Bakery

11 Creditor also attempted to meet and confer regarding the scope of the examinations. In order
12 to confirm his status as a fully secured creditor prior to plan confirmation, Creditor requires the
13 following information:

- 1 1. All filed federal and state tax returns, with schedules and supporting documentation,
2 for tax years 2010–2021
- 3 2. Account and wage transcripts from the Internal Revenue Service and Franchise Tax
4 Board for tax years 2010–2021
- 5 3. Profit and loss and balance sheets for tax years 2017–current for Debtors and their
6 various sole proprietorships and corporations
- 7 4. All bank statements for January 2017–current for Debtors and their business
8 enterprises
- 9 5. Mortgage statements for 2017–current for Debtors' real property at 4060 W 134th St.,
10 Hawthorne, CA 90250
- 11 6. All documents showing rental agreements and payments of rent for residents at
12 Debtors' real property at 4060 W 134th St., Hawthorne, CA 90250
- 13 7. All documents supporting Debtors' valuation for the real property at 4060 W 134th
14 St., Hawthorne, CA 90250

15 Pursuant to LBR 2004-1(a), Creditor attempted to meet and confer by email and call
16 regarding the examinations. The first emails and call led to some productive discussions, but the
17

1 second call did not take place as scheduled. Griffin Decl. ¶¶ 3–7. Creditor has chosen dates for the
2 examinations well in excess of 21 days to accommodate everyone's schedules and give time for the
3 examined individuals and entities to collect the requested documents, and will continue to meet and
4 confer on any disputes as required by LBR 2004-1(g).

5 On these grounds, Creditor requests an order as follows:

6 1. The Court enter an order allowing for the examination of debtor Martin Ramirez
7 Troche and the documents requested; and
8 2. Any other and further relief the Court deems necessary or proper.

9 Dated: September 4, 2022

10 /s/ Daniel Griffin
11 Daniel Griffin
12 Attorney for Creditor
13 Scott Dain
14 c/o Law Offices of Anthony C. Duffy

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